

EXHIBIT 8

From: [Droze, William M.](#)
To: [Gary Davis](#)
Cc: [Stacy Snow](#); [Jeff Friedman](#); [Andy Davis](#); [Lee Patterson](#); [West, Kadeisha A.](#); [Bailey, Matt](#)
Subject: RE: Parris v. Mount Vernon Mills, et al.
Date: Monday, November 7, 2022 5:12:45 PM
Attachments: [image001.png](#)

Gary: thanks for your email. I had understood your proposal to be more limited and to focus on materials suppliers identities and sales and MSDS/SDS documents prior to 2016. As I explained, a 1992 time frame coupled with "all documents" and "all communications" requests is problematic. We will get back with you with our position. Thank you for your time today. Best, W

William M. Droze

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From: Gary Davis <gadavis@enviroattorney.com>
Sent: Monday, November 7, 2022 4:57 PM
To: Droze, William M. <william.droze@troutman.com>
Cc: Stacy Snow <ssnow@enviroattorney.com>; Jeff Friedman <jfriedman@friedman-lawyers.com>; Andy Davis <adavis@brinson-askew.com>; Lee Patterson <lpatterson@friedman-lawyers.com>; West, Kadeisha A. <Kadeisha.West@troutman.com>; Bailey, Matt <matt.bailey@troutman.com>
Subject: RE: Parris v. Mount Vernon Mills, et al.

EXTERNAL SENDER

William,

Here is what we discussed in our meet and confer on MVM's discovery objections today.

Plaintiff is willing to limit the time period going back to 1992, which is when we currently understand the Trion sludge disposal began in the Racoon Creek watershed.

Here are the specific documents we would want to be produced for this timeframe.

REQUEST TO PRODUCE NO. 1:

All documents pertaining to Your purchase of any PFAS-containing products from any Defendant named in Plaintiff's Complaint for use at the Trion facility.

REQUEST TO PRODUCE NO. 2:

All documents pertaining to Your purchase of any PFAS-containing products from any other entity, not named in Plaintiff's Complaint, for use at the Trion facility.